

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NORTH DAKOTA

In re:)	Case No. 23-30132
)	(Chapter 11)
CHRISTOPHER WAYNE GLENN)	
)	
Debtor.)	

MOTION FOR ENTRY OF DISCHARGE

Comes now Christopher Wayne Glenn (“Mr. Glenn” or the “Reorganized Debtor”), by and through undersigned counsel, pursuant to Section 1192 of Title 11 of the United States Code, and moves for entry of a discharge, and in support thereof states as follows:

As previously observed in a notice of substantial consummation, DE #130, Mr. Glenn has paid all obligations under his confirmed plan of reorganization (as amended), DE #120, excepting (i) future secured debt payments, not yet due; (ii) a disputed tax claim; and (iii) fees owed to the Subchapter V trustee. *See* Notice of Substantial Consummation, DE #130.

Mr. Glenn is delighted to report that he has now paid the Subchapter V trustee’s fees and the whole of the disputed tax claim (reserving his right to seek a refund for overpayment). With these payments, his obligations under the plan have been fully honored and, pursuant to Title 11 of the United States Code (the “Bankruptcy Code”), it is now appropriate to grant Mr. Glenn a discharge. 11 U.S.C. § 1192.¹

¹ The Local Rules of this Honorable Court provide, *inter alia*, “[u]pon completion of all applicable payments under the plan in an individual Chapter 11 case, the debtor must file a motion for discharge that complies with section 1141(d)(5).” Local Rule 4004-1(A). However, Section 1141(d)(5) is not applicable to cases brought pursuant to subchapter V of chapter 11. *See* 11 U.S.C. § 1181(a) (Sections 105(d) . . . and 1141(d)(5) of this title do not apply in a case under this subchapter.”). Accordingly, this motion is brought under Section 1192, not Section 1141(d)(5).

WHEREFORE, Mr. Glenn respectfully prays this Honorable Court (i) grant him a discharge in accord with the allowances of Section 1192 of Title 11 of the United States Code; and (ii) afford such other and further relief as may be just and proper.

Respectfully submitted,

Dated: April 3, 2025

By: /s/ Maurice B. VerStandig
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of April, 2025, a copy of the foregoing was served electronically upon filing via the ECF system, with service to all parties registered to receive such service.

I FURTHER CERTIFY on April 4, 2025, a copy of the foregoing—inclusive of the notice appended hereto—is being sent via US Mail, postage prepaid, to all parties on the attached mailing matrix *except* (i) the mailing matrix itself is not being sent to any parties; and (ii) no copy is being sent to undersigned counsel or this Honorable Court.

/s/ Maurice B. VerStandig
Maurice B. VerStandig